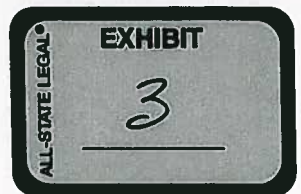
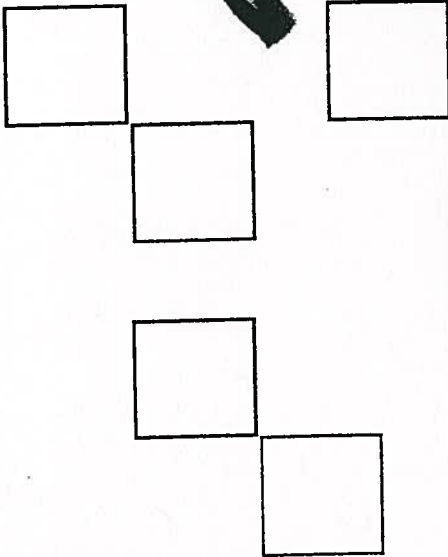




associate guide





The Home Depot and its affiliates are dedicated to being an Employer of Choice and provides numerous programs to provide a safe, employee-centered work environment. These programs include the InFocus safety program, the Homer Fund and Care Solutions for Life. From the very beginning, The Home Depot has been committed to doing right by our associates, our customers, our vendors, our communities and our shareholders. Acting with integrity and doing the right thing are the driving forces behind the Company's extraordinary success.

"Doing the right thing" is a relatively easy concept to understand. Yet, actually doing the right thing is not always that simple. Because The Home Depot and its affiliates want our associates to be equipped to conduct themselves and the Company's business in the most ethical and appropriate manner possible, we have developed a Code of Conduct. The Code of Conduct is a means to ensure that we work in an environment that is in line with our values. This Code of Conduct provides you with guidelines to better understand standards of professional conduct in the workplace in order to maintain a safe and productive environment.

Standards of Conduct

The Home Depot and its affiliates ("Home Depot" or "Company") are committed to the highest standards of ethical and professional conduct. The Company recognizes that as associates, you expect to be informed of what is expected of you and the consequences that will result if those expectations are not met. As a result, standard, common sense rules of conduct that are necessary for orderly and efficient operations have been established. The following provides examples of two types of prohibited conduct: (1) Major Work Rule Violations, which are considered to be so severe in nature that they would normally result in termination for a first offense; and (2) Minor Work Rule Violations, which are considered to be unacceptable behavior in the workplace that would normally result in discipline and may individually or cumulatively result in termination depending on the seriousness of the offense(s).

The rules, regulations, and policies contained in this Standard Operating Procedure (SOP) apply to all associates regardless of position with the Company. As an associate, you have certain responsibilities to the Company, your supervisor, your fellow associates, our customers and our vendors. These rules, regulations, and policies also apply at all times that associates are on Company premises including all buildings, grounds, vehicles, and parking areas used by the Company to conduct its business, whether owned or rented by the Company, during any period of time when associates are performing duties for The Home Depot and may also apply to off-duty, off-premises conduct.

Anyone violating these rules of conduct may be disciplined up to and including termination. The reasons listed for discharge or discipline are examples only and are not meant to, and do not, include all reasons for which an associate may be disciplined or discharged. The Code of Conduct is a part of the Company's Ethics Code, Compliance Policy, as same may be amended from time to time.

This Code of Conduct does not create a contract between Home Depot and any Home Depot associate. No promise of any kind is made by Home Depot in this Code of Conduct. Home Depot is free to change the terms of this Code of Conduct, or the terms of an associate's employment, without having to consult with or obtain the agreement of the associate. Home Depot and the associate each continue to have the absolute authority to terminate the employment relationship at will. The employment relationship may be terminated with or without cause, and with or without prior notice. This at will status can only be modified if such modification is in writing and signed by both the associate and the CEO of the Company.

Respect Policy

Respect for All People is one of Home Depot's core values. The Company is committed to creating an environment of mutual respect, free of harassment and discrimination for our associates, customers and vendors. Associates are expected to treat all associates, customers and vendors with courtesy and to resolve any differences in a professional, non-abusive, non-inflammatory and non-threatening manner. Associates are responsible for their own behavior and for understanding how others may perceive their conduct in the workplace. Conduct that may be acceptable outside the work environment may be unacceptable in the workplace.

Act with Integrity and Honesty

The Home Depot expects all associates to act with integrity and honesty in all matters related to Company business. Associates may not obtain or use any property or services of the Company, fellow associates, our customers, visitors or vendors in a manner other than that authorized by Company policy or by federal, state or local laws.

Associate Behavior

Associates must perform their assigned duties to the best of their ability and in the best interest of the Company, fellow associates, our customers, visitors, vendors and shareholders. Associates must not take any action that creates a risk, harm or damage to oneself, another person, the Company, or the property of the Company or others.

Associates must adhere to and fully comply with all Company policies and procedures, as contained in the Standard Operating Procedures and Compliance Policies, which can be found in the Code of Conduct brochure or on the Company's intranet site and obtained by request to a Human Resource Manager. This includes policies not specifically outlined in the Code of Conduct.

Attendance and Punctuality

To provide the level of service that the Company's customers expect and deserve, all associates are expected to report for work at the assigned time, ready to perform their assigned duties and work their assigned scheduled hours. Refer to Attendance Guidelines.

Following Instructions

Associates are expected to follow the directions and instructions of supervisors and managers, unless doing so would clearly violate the law or Company policy.

Promotion &

Employment Standards

The Home Depot is an employer of choice wherever we do business. The Company strives to attract, motivate and retain a high performing, diverse workforce. Making good hiring decisions is crucial to the Company's success. All hires, transfers and promotions must be done using the Company's Standard Operating Procedures, Promotion & Employment Standards and the Store Level Entry System (SLE), where available. The Store Manager is responsible for all hiring, transfer and promotion decisions regardless of which members of the management team assist in the process.

NOTE: Store Support Centers, Contact Centers and Home Depot Supply might not have access to the SLE hiring system.

Safety Policy

It is important to maintain a safe work and shopping environment for associates, customers and vendors. Associates must follow the Company's safety standards to ensure the safety and well being of all customers, associates and vendors. Every associate must take personal responsibility and ownership for safety. All associates are required to immediately address safety issues and report unsafe conditions or behaviors to your manager. See your Manager for clarification on any safety standards.

Substance Abuse Policy

The Company strives to provide a safe, productive environment for its associates, customers and vendors. This includes a safe workplace, free of the problems associated with the use and abuse, including having detectable levels based on the Company's testing standards, of alcohol, illegal or non-prescribed controlled substances. All use (including having detectable levels based on the Company's testing standards), sale, distribution, possession or transfer of alcohol, or illegal drugs, or illegal use of prescription drugs when on the job, on Company premises (the store and adjacent parking lots), or in Company owned or rented vehicles is strictly prohibited. Associates choosing to consume alcohol at Home Depot events or functions (not on the job and not on Home Depot property) must limit their intake to moderate amounts. Whether consuming alcohol or not at off-site social events, all Home Depot associates must display appropriate behavior, consistent with Company values and respectful of all others and their property. Illegal substance use and abuse subjects the Company to unacceptable risks of workplace accidents, errors or other behaviors that would undermine the Company's ability to operate safely, effectively and efficiently. Therefore, to maintain an alcohol, drug and substance abuse free workplace, the sale, offering, possession or use of alcohol or illegal or non-prescribed controlled substances is prohibited.

Possession of Weapons and Explosives

The Company does not permit associates to possess or use any kind of weapon, explosive or other dangerous implement while associates are at the workplace or otherwise performing duties on behalf of the Company. This policy applies whether or not is armed, loaded, or properly secured and whether or not it is concealed on a associate's person or contained in an associate's personal property such as a purse, briefcase, or vehicle. Pepper spray, mace and teargas, where legal, may be carried on Company premises only while going to and from work (i.e., at the beginning and end of shift). Such products should not be carried in an associate's apron or while the associate is working. Use of such products to defend yourself against physical attack on Company premises or time, while going to and from work, may be acceptable if otherwise deemed appropriate. Use of such products to initiate a confrontation on Company premises or while performing duties on behalf of the Company is prohibited, even while going to and from work. Associates bear complete legal responsibility for their use of such products.

Workplace Activity

Staying focused and providing the best service to our customers is critical to the Company's success. For this reason, it is important that the workplace be primarily for authorized Company activities. Associates on Company premises should be engaged in work activity except during lunches and breaks. Solicitation or distribution of literature is not allowed on Company property.

Workplace Violence/Threats of Violence

Any associate who becomes aware of a display of violent, abusive or threatening behavior, or a threat to engage in such behavior, or who witnesses such behavior, is to report such behavior to his or her immediate supervisor, manager or to Human Resources.

Major Work Rule Violations

This section provides examples of prohibited conduct that will normally result in termination for a first offense, which includes but are not limited to, the list below:

Violation of Respect Policy

Discrimination or Harassment

- Discriminating against an associate, customer, or vendor on the basis of race, color, gender, sexual orientation, age, religion, national origin, disability, or any characteristic protected by applicable law
- Engaging in any activity that violates the Company's sexual harassment or general harassment policies or other behavior prohibited by the harassment policy towards an associate, customer, or vendor (see SOP 01-21). Harassment or disrespectful behavior can be verbal, non-verbal or physical. Examples of conduct that could be considered harassment or disrespectful behavior include, but are not limited to, directing abusive or obscene language to fellow associates, customers or vendors, offensive jokes, threats of termination, or other willful creation of circumstances that would make the workplace intolerable
- Treating a fellow associate, customer or vendor in an abusive, threatening or inflammatory manner
- Making intentional false reports of harassment or other false statements about associates
- Retaliating against an associate who makes a good faith complaint of discrimination or harassment or who participates in an investigation of such complaint

Failure to Act with Integrity and Honesty

- Stealing or attempting to steal the property of a customer, fellow associate, the Company or a vendor, whether retail or non-retail, and regardless of purpose, the amount involved or the method used to remove the property from the premises; knowingly possessing any such stolen property
- Filing transactions for oneself or friends/family
- Selling, buying or distributing merchandise or services at other than the authorized prices
- Fraudulent reporting of travel or business expenses (also see Falsifying a Company document below)
- Using corporate credit cards for unauthorized purposes
- Failing to pay past due balances on corporate credit cards
- Falsifying a Company document or a document relied upon by the Company, by including false information or by knowingly omitting relevant information. The following are examples:
 - Falsifying reports, medical excuses, applications, etc.
 - Making false reports or claims
 - Using another Cashier's log number
 - Manipulating inventory

- Clicking in or out for another associate or allowing another associate to clock you in or out
- Improperly using an associate's social security number or employment ID
- Removing documents/counseling notes/performance evaluations from a file without proper authorization from your HR representative

- Altering, falsifying, destroying, or misusing any employment documentation including computerized materials and time clock records
- Misusing funds from Matching Gift Program, Homer Fund or Employee Fund
- Participating in or inappropriately influencing a transaction between Homer Depot and another individual or organization when self-interest is involved; any situation where a conflict of interest exists between the Company's interests and an associate's personal interests (i.e., soliciting work from customers for personal gain)
- Working off the clock
- Asking an associate to commit a fraudulent or illegal act including working off the clock
- Holding merchandise off of the sales floor for personal benefit

Associate Behavior/Conduct Unbecoming

- Initiating or participating in physical altercations or assault, attempted assault or offensive, aggressive and/or threatening conduct (i.e., threats of bodily harm to a person or family, etc.)
- Vandalizing Company, associate, vendor or customer property or willfully attempting to cause harm, damage, or injury to another person, to the property of that person, or to the property of the Company, whether or not the harm, damage, or injury actually occurs
- Taking any action that creates a security or loss prevention risk, whether or not such risk results in financial loss or causes harm or damage to oneself, another person, the Company or others
- Being convicted of, or pleading guilty or no contest to, a serious criminal offense which substantially relates to the job including crimes involving violence or dishonesty (i.e., theft, fraud, sexual assault, possession of illegal drugs, etc.)
- Assigning work that places associates at risk of serious harm, significant damage to Company property or financial loss to the Company whether or not such harm or damage occurs; knowingly allowing associates to perform work or assignments under unsafe conditions
- Disclosing confidential or proprietary information without specific authorization. Such information includes, but is not limited to: financial records, sales information or events, confidential products or promotional lines, customer account information, vendor pricing agreement, marketing or forecasting information, associate information such as disciplinary actions, phone number, addresses, Social Security Number

Attendance/Punctuality

- Failing to report to work for two consecutive scheduled days without calling a salaried manager and/or without satisfactory explanation to give notice of the absence. When possible, associates must provide sufficient prior notice to a salaried manager. See Attendance Guidelines

Failure to Follow

Instructions/Insubordination

- Being flagrantly insubordinate
- Refusing to perform assigned work tasks or follow directions unless doing so would clearly violate Company policy or the law

- Refusing to submit to a search of personal belongings by an authorized manager while on Company property
- Impeding, refusing or failing to cooperate with an internal investigation

Violation of Promotion & Employment Standards

- Assigning an associate to a position before the associate has qualified for the position and passed any appropriate test
- Failing to interview the correct number of candidates
- Intentionally allowing new hires to begin work prior to receiving all required pre-employment paperwork, such as results of a negative drug screen or background screening or before the hire is processed in the AIMS system
- Paying new hire salary outside of the appropriate payroll system due to failure to process appropriate pre-employment paperwork

Violation of Safety Policy

- Every associate must take personal responsibility and ownership for safety. All associates are required to immediately address safety issues and report unsafe conditions or behaviors to your manager. Refer to SOP 09-28, 09-29, 09-65 and Safety Training class materials for detailed information on safety policies and guidelines

Violation of Loss Prevention Policy

- Pursuing or apprehending a subject without being authorized as described in the Loss Prevention External Policy Guidelines
- Failing to report a Non-Recovery Incident in violation of the Loss Prevention External Policy Guidelines
- Conducting or participating in any surveillance off company property without appropriate prior approval

Violation of Substance Abuse Policy

- Violating the Alcohol Policy as outlined under Standards of Conduct
- Selling, distributing, offering, possessing, transferring or using alcohol or illegal/controlled substances during working time or on Company premises
- Engaging in the illegal use of prescription drugs during working time or on Company premises
- Having detectable levels of alcohol, drugs, or non-prescribed controlled substances as determined by a drug/alcohol test
- Failing to produce a valid prescription when testing positive for prescription drug use
- Refusing or failing to take a required drug and/or alcohol test within the defined period of time
- Tampering with or adulterating a drug or alcohol test
- Failing to notify a manager before beginning work of any drug or medication taken that may inhibit the associate's ability to work or to operate equipment safely

Possession of Weapons and Explosives

- Possessing or using any kind of weapon, explosive or other dangerous implement while on Company premises or while performing duties for the Company, whether or not it is armed, loaded, or properly secured and whether or not it is concealed on an associate's person or contained in an associate's personal property such as a purse, briefcase, or vehicle

Workplace Violence/Threats of Violence

- Direct threats or acts of violence made by an associate against another associate, customer or vendor
- Failure to report threats or acts of violence by an associate, former associate, customer, or vendor, to a member of management

Discipline Guidelines for Major Work Rule Violations

Major Work Rule Violations are so serious in nature as to normally warrant termination for a first offense.

Minor Work Rule Violations

Examples of prohibited conduct include, but are not limited to, the following conduct. Violations may result in disciplinary action up to and including termination.

Violation of Respect Policy

- Failing to treat associates, customers, or vendors with respect or engaging in other inappropriate conduct toward others
- Failing to notify a Home Depot manager, a member of Human Resources management or a designated Company resource of discrimination or harassment

Failure to Act with Integrity and Honesty

- Having three (3) returned checks to Home Depot in 12 months
- Performing unauthorized work off of Company premises
- Failing to perform assigned work after docking in

Associate Behavior/Conduct Unbecoming

- Smoking in other than designated areas or in Company vehicles or on Company property (unless in a designated area as described in SOP 01-30, Substance Abuse)
- Violating the Dress Code (SOP 01-19, Dress Code)
- Reporting to work in an unfit condition to perform assigned work
- Unintentionally destroying, losing, or misusing property of a minor nature
- Failing to maintain proper accounting for the Employee Fund
- Participating in or inappropriately influencing a transaction between The Home Depot and another individual or organization when there is no self interest involved; other appearances of a conflict of interest between Company interests and personal interests
- Violating the No-Solicitation policy (SOP 01-25, Solicitation)
- Arguing or bickering with customers, vendors or their representatives
- Violating the Company's policies and procedures as contained in SOP, the Loss Prevention Internal and External Policy Guidelines, Manager's Safety Reference Guide and Compliance Policies that are not otherwise considered a major work rule violation

Attendance/Punctuality (See Attendance Guidelines)

- Failing to work as scheduled without sufficient prior notice to or authorization by salaried management
- Having unexcused absences
- Having excessive unexcused tardiness
- Having excessive missed punches

Following Instructions/Insubordination

- Failing to perform a specifically assigned work task or follow directions unless doing so would clearly violate Company policy or the law

Violation of Safety Policy

Associates must follow the Company's safety standards to ensure the safety and well being of all customers, associates and vendors. Refer to SOP 09-28, 09-29, 09-65 and Safety Training class materials for detailed information on safety policies and guidelines.

Workplace Activity

- Loafing conduct during working hours that demonstrates a significant lack of attention to assigned duties and responsibilities (example: sleeping, reading for personal pleasure, etc.)

Discipline Guidelines for Minor Work Rule Violations

Coaching Session

A Coaching Session is used to bring to light an inappropriate behavior and/or action by an associate.

Counseling Session

A Counseling Session is used to call attention to a behavior and/or action that the associate has demonstrated in violation of Company policy or procedure.

Final Counseling Session

A Final Counseling Session is used if an associate demonstrates a pattern of behavior, repeatedly violates the Company's policies and procedures, has received a Coaching Session more than once (3), and/or commits a serious violation that does not warrant termination for a first offense.

Termination Session

For minor work rule violations, this meeting normally occurs after repeated violations of Company policies as the final step in the disciplinary process.

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